

Exhibit I

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND**

ALEC CERULLO,
Plaintiff

v.

**LT. GALLIGAN, LIEUTENANT
CO CALISE, CORRECTIONAL OFFICER
LT. TIERNEY, LIEUTENANT
INDIVIDUALLY AND IN THEIR
OFFICIAL CAPACITIES**
Defendants

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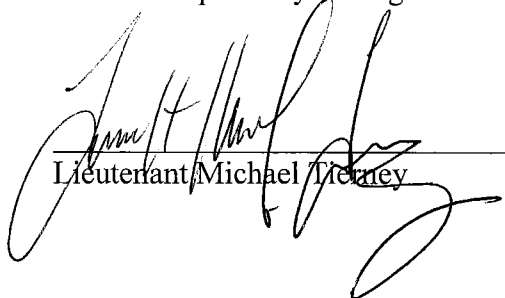
C.A. No. 15-531-M-PAS

AFFIDAVIT OF LIEUTENANT TIERNEY

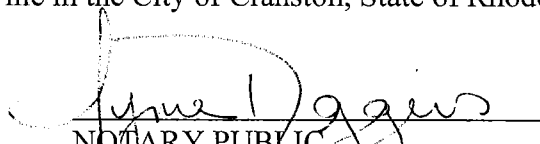
I, Lieutenant Michael Tierney, being duly sworn, depose and state as follows:

1. I am a Correctional Officer who holds the rank of Lieutenant and my bidden post is at the High Security Center at the Rhode Island Department of Corrections.
2. In March, April, and May of 2015 I was the Lieutenant who investigated grievances at the High Security Center.
3. Any inmate at the High Security Center could submit a "pink slip" to the area Lieutenant requesting several things including the informal resolution of a grievance and requesting a grievance form.
4. If an inmate requested a grievance form, the "pink slip" would be forwarded to me and I would supply that inmate with the grievance form by either bringing it to the inmate's cell or by having another officer bring the grievance form to the inmate's cell.
5. My practice was to write the inmate's name in the top left corner of the grievance form to ensure that the correct inmate receives the requested grievance form. See e.g. Exhibits C, Grievance 2015-0099; Exhibit D, Grievance 2015-0100.
6. To the best of my recollection, every time plaintiff requested a grievance form one was supplied to him.
7. At no time did I deny plaintiff access to a grievance form for any reason.
8. Inmate "pink slips" are not kept once the request on each is fulfilled or it is returned to the inmate with the response to their informal grievance.

9. I was the investigating officer on plaintiff's two level-1 grievances. Exhibits C, *Grievance 2015-0099*; Exhibit D, *Grievance 2015-0100*.
10. I determined that both grievances should be denied due to the reasons set forth in my investigator's reports. Exhibits C, *Grievance 2015-0099*; Exhibit D, *Grievance 2015-0100*.
11. To the best of my recollection, plaintiff did not request a level 2 grievance after the denial of the above reference level-1 grievances.
12. To the best of my recollection, plaintiff did not request any other grievance forms in March, April, or May of 2015.


Lieutenant Michael Tierney

Subscribed and sworn to before me in the City of Cranston, State of Rhode Island on this 29th day of April, 2016.


NOTARY PUBLIC
Commission Expires: 12/15/18